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Attorneys for CARD

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

BNSF,

Plaintiff

vs.

CARD,

Defendant.

CV-19-40-M-DLC

**CARD'S PROPOSED
SUPPLEMENTAL JURY
INSTRUCTIONS**

The Center for Asbestos Related Disease, Inc. (CARD) now submits the attached proposed supplemental jury instructions.

DATED this 19th day of June, 2023.

/s/ Timothy M. Bechtold
BECHTOLD LAW FIRM, PLLC

INSTRUCTION NO. _____

Diagnosis of asbestosis, pleural thickening, or pleural plaques is established by interpretation by a “B Reader” qualified physician of a plain chest x-ray or interpretation of a computed tomographic radiograph of the chest by a qualified physician, as determined by the Secretary.

“Diagnosis” §1881A

CARD’S PROPOSED INSTRUCTION NO. C18

INSTRUCTION NO. _____

“Diagnosis” is the art or act of identifying a disease from its signs and symptoms.

Diagnosis defined. Merriam Webster “diagnosis.”

www.merriamwebster.com/dictionary/diagnosis.

CARD’S PROPOSED INSTRUCTION NO. C19

INSTRUCTION NO. _____

Diagnosis of asbestosis, pleural thickening, or pleural plaques is established by interpretation by a “B Reader” qualified physician of a plain chest x-ray or interpretation of a computed tomographic radiograph of the chest by a qualified physician, as determined by the Secretary.

INSTRUCTION NO. _____

“Diagnosis” is the art or act of identifying a disease from its signs and symptoms.